

ORIGINAL

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BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission

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2011 MAR 29 A 10: 54

MAR 29 2011

ARIZONA CORPORATION COMMISSION  
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IN THE MATTER OF THE  
APPLICATION OF TUCSON ELECTRIC  
POWER COMPANY FOR APPROVAL  
OF A RESIDENTIAL BILL  
COMPARISON PILOT PROGRAM

DOCKET NO. E-01933A-07-0401

**SWEEP COMMENTS ON THE  
STAFF REPORT AND  
RECOMMENDED ORDER**

**COMMENTS OF THE SOUTHWEST ENERGY EFFICIENCY PROJECT  
ON THE TEP RESIDENTIAL BILL COMPARISON PILOT PROGRAM**

1 The Southwest Energy Efficiency Project ("SWEEP") appreciates the opportunity to submit  
2 comments in response to the Recommended Order filed by Staff on March 15, 2011, regarding  
3 Tucson Electric Power Company's ("TEP" or "Company") Application for Approval of its  
4 Residential Bill Comparison Pilot Program ("Pilot Program").

5  
6 SWEEP recommends Commission approval of the Pilot Program and appreciates Staff's report  
7 and recommendations. We believe that the Pilot Program will empower customers to reduce  
8 their energy use and save on their monthly energy bills by educating participants about their  
9 energy consumption and enabling them to compare their usage with that of other homes. The  
10 program will also alert consumers to other energy efficiency program opportunities, which  
11 participants can leverage to achieve additional monetary and energy savings. SWEEP also  
12 supports third-party evaluation to verify the Pilot Program's savings and success.

13  
14 Similar customer behavior and bill comparison programs have been demonstrated to be both  
15 effective and cost-effective in informing customers about their energy use and in assisting  
16 customers in reducing their energy use and utility bills. Evaluations in other states have found  
17 that similar programs achieve energy savings of 1% to 3.5% for customers. SWEEP also notes  
18 that the Commission previously approved a similar program (the Residential Conservation  
19 Behavior Program) for APS in Decision No. 71950. Therefore, SWEEP recommends  
20 Commission approval of the TEP Pilot Program.

21  
22 Further, SWEEP suggests that the Recommended Order be clarified to ensure consistency with a  
23 prior Commission order, i.e., to allow the Pilot Program to continue until further order of the  
24 Commission, by using the same approach that was used for the APS Residential Conservation  
25 Behavior Program in Decision No. 71950, which stated:

26  
27 "IT IS FURTHER ORDERED that the Conservation Behavior program be continued  
28 until further order of the Commission." Decision No. 71950.

1  
2 Specifically, SWEEP recommends the following language be inserted in the Recommended  
3 Order on page 10:  
4

5 Page 10, line 27, **INSERT:**

6 "IT IS FURTHER ORDERED that if the pilot program is found to be cost-effective by  
7 the measurement and evaluation study, the program may be continued until further order  
8 of the Commission."  
9

10 If the Commission adopts the order above, the Pilot Program could continue to serve customers  
11 and achieve energy savings for customers, as long as it was found by the measurement and  
12 evaluation study to be cost-effective, during the period of Staff's review of the measurement and  
13 evaluation report and the Commission's consideration of any recommendations from Staff. The  
14 cost-effective program would continue to serve customers rather than potentially be interrupted  
15 for a regulatory review process. SWEEP recommends that this is the appropriate treatment for  
16 cost-effective pilot programs, which SWEEP believes should continue to be implemented to  
17 benefit customers rather than be interrupted and then restarted at a future date. The proposed  
18 language is also consistent with the Commission's prior order approving a similar program for  
19 APS.  
20

21 Thank you for the opportunity to submit these comments.  
22  
23

24 Respectfully submitted this 28<sup>th</sup> day of March 2011 by:  
25  
26

27 \_\_\_\_\_  
28 Jeff Schlegel & Ellen Zuckerman  
29 Southwest Energy Efficiency Project

1 ORIGINAL and thirteen (13) copies filed this 29th day of March 2011, with:

2  
3 Docket Control

4 ARIZONA CORPORATION COMMISSION

5 1200 West Washington Street

6 Phoenix, Arizona 85007

7  
8 COPIES of the foregoing sent via email and/or mail this 29th day of March 2011, to:

9  
10 All Parties of Record